

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 1:24-cv-23583**

CHRISTOPHER SADOWSKI,

Plaintiff,

V.

THE BILTMORE HOTEL LIMITED  
PARTNERSHIP,

Defendant.

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**DEFENDANT BILTMORE HOTEL LIMITED PARTNERSHIP'S  
RESPONSE TO PLAINTIFF'S MOTION FOR EXTENSION OF TIME FOR  
MEDIATOR SELECTION**

Defendant The Biltmore Hotel Limited Partnership ("Biltmore" or "Defendant"), by and through its undersigned counsel, hereby responds to Plaintiff's Motion for Extension of Time for Mediator Selection [D.E. 12], and states as follows:

1. On October 31, 2024, the Court issued the Scheduling Order
2. From November 6, 2024 – November 13, 2024, counsel for the parties communicated with regularity about the proposed mediators.
3. In the afternoon on November 19, 2024, an assistant to Counsel for Plaintiff sent a reminder about the November 20, 2024 deadline, but did not state a specific deadline time on November 20, 2024.
4. Late in the afternoon on November 20, 2024, with no additional communication via phone or email to Counsel for the Biltmore, Counsel for Plaintiff made its filing.
5. From late in the afternoon of November 20, 2024 through the date of this filing the Parties were in communication with regard to selection of a mediator.

6. Counsel for the Biltmore and Counsel for Plaintiff have engaged in an ongoing discussion of possible mediation dates.
7. The Parties have not yet finalized the scheduling of a mediator.
8. Given that the deadline for mediator selection/scheduling is on Friday, December 6, 2024, and given the recent correspondence between the Parties, the Biltmore respectfully requests that the court extend the deadline for selecting and scheduling mediation to December 18, 2024.
9. Counsel for Plaintiff consented to the request in Paragraph Eight herein via an email sent on December 4, 2024 at approximately 12:28 PM.

Dated: December 4, 2024

Respectfully submitted,

By: /s/ Heidi H. Tandy  
Heidi H. Tandy, Esq.  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 4, 2024, a true and complete copy of the foregoing was filed with the Clerk of the Court using CM/ECF, which will electronically serve all counsel of record on the service list.

By: /s/ Heidi H. Tandy  
Heidi H. Tandy, Esq.

**SERVICE LIST**

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